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From: Tristao, Dennis <dtristao@jgboswell.com>
Sent: Wednesday, April 19, 2017 8:43 AM
To: Pyle, Jeffrey@Waterboards
Cc: Lemus, Jose; Isaac Faria; Tristao, Dennis
Subject: TENTATIVE WASTE DISCHARGE REQUIREMENTS FOR J.G. BOSWELL COMPANY
CORCORAN TOMATO PROCESSING FACILITY KINGS COUNTY
Attachments: Attachment B - Process Flow Diagram.pdf; jgboswell_ctpf_cov let.pdf

April 19, 2017

Jeffery Pyle
Central Valley regional Water Quality Control Board
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Email: jpyle@waterboards.ca.gov

RE: TENTATIVE WASTE DISCHARGE REQUIREMENTS FOR J.G. BOSWELL COMPANY CORCORAN
TOMATO PROCESSING FACILITY KINGS COUNTY

Dear Mr. Pyle:

We are in receipt of the Tentative Waste Discharge Requirements (WDR) dated 28 March 2017, thank you for your work in developing these WDR's - it is greatly appreciated. These proposed WDRs were developed in response to a Technical Report submitted by JG Boswell Company (JGB) requesting to expand the discharge land use area to include acres contained in Sections 30, 31, 32, 33, and 34. The current Report of Waste Discharge (ROWD) dated 25 November 2008 only includes Sections 33 and 34. No changes other than increasing the discharge land use area were proposed. Our comments are highlighted in the attached draft, and summarized below to offer clarity. A few introductory comments may be in order; first, the request to add additional lands to the designated use area was a voluntary action undertaken to utilize the wastewater generated by the tomato paste processing plant over a broader crop production area. In light of the recent draught our desire was to have the opportunity further blend the effluent with additional existing water sources for application to adjacent farm ground. Second, the additional lands are currently subject to the Irrigated lands Regulatory Program (ILRP), and are enrolled in the Kings River Water Quality Coalition. As such we noted within the monitoring and reporting program certain requirements that we are requesting be modified due to the current and continued ILRP regulatory oversight, and to address what may be considered unnecessary additional monitoring. We do not intend to withdraw these lands from the ILRP because the discharge application from the facility on the DIS-02 will be of short duration and limited in scope, the irrigated lands program is comprehensive. We welcome discussion on this point. Finally, all of the lands subject to this proposed order are within the Tulare Lake Drainage District (TLDD). The TLDD is a quasi-regulatory public agency engaged in the removal and treatment of salt (together with other constituents) in an effort to protect both the underlying ground water and continued productivity of the soils within the district. As such, TLDD is also an active stakeholder in the Central Valley Salinity Alternatives for Long Term Sustainability (CV-SALTS) - our operations participate in the CV-SALTS program through TLDD. Our opinion is that generally we share with the Regional Water Quality Control Board a common goal to protect the beneficial uses underlying groundwater from degradation and to protect and enhance the overlying productive soils.

COMMENTS/DISCUSSION:

As noted, Order No. R5-2008-0015 was adopted by the California Regional Water Quality Control Board, Central Valley Region, at its 25, January 2008 meeting and this order was subsequently clarified in an updated November, 2008 Report

of Waste Discharge submittal which highlighted that the blending of the process wastewater with fresh water occurred at the facility and was then conveyed to the impoundment, where the effluent was then passed through filtering screens prior to being applied to the land application area. As demonstrated by the report submittals the blended ratio has always been in excess of 1:1. The 2008 revised RWD submittal also limited monthly average process wastewater flow to 1.4 mgd, and proposed that wastewater discharge from the Facility to 4.5 mgd. Based upon previous discussions, we think that the Board Staff has this same understanding of the blending as we do. The wording edits within the Tentative WDR on this topic are offered to convey this understanding and we are very open to discussion with staff. We have also attached a flow diagram to this email which is an overlay of that provided in the notice.

Existing Facility and Discharge 7, page 2, "The tomatoes are then unloaded and rinsed with fresh water and then conveyed in a flume using condensate water from the evaporative cooling towers and fresh water to the sorting area." Fresh water is also added at the cooling towers which is then dispensed to the flume to transport the tomatoes.

Existing Facility and Discharge 11, page 3, "J.G. Boswell may discharge up to 1.4 million gallons per day (mgd) of process wastewater and up to 4.5 mgd of total discharge during the processing season which includes fresh water and process wastewater blended onsite."

Existing Facility and Discharge 12, page 3, "In 2016, the average daily discharge of process wastewater was 0.45 mgd with a daily maximum of 0.81 mgd, well below the 1.4 mgd limit. In 2016, about 824 acre-feet of irrigation water including facility tomato processing wastewater (effluent) was applied to 684 acres for an average application of 1.20 feet of irrigation water. The average daily flow of effluent plus the blended water discharged from the Facility was 2.9 mgd ..."

Antidegradation Conclusions 48, page 13, "This Order contains Effluent Limitation B.1 that limits the average daily discharge to 1.4 mgd of process wastewater and up to 4.5 mgd of total discharge to the lined retention pond during the processing season...."

Other Regulatory Considerations 59 a., page 15, "Effluent Limitation B.1, which restricts the monthly average flow of process wastewater to 1.4 mgd and up to 4.5 mgd of total discharge from the Facility for irrigation."

Other Regulatory Considerations 59 b., page 15, "...be consistent with crop demand [Note: possibility exists that annual loading may be temporarily exceeded if crop yield is jeopardized due to an unforeseen act of nature." This is an area where lands in DIS-02 be subject to the IRLP due to the minimal amount of effluent being discharged to this area during a short period of time and crop production over the remainder of the year.

B. Effluent Limitations 1, page 17, "During the processing season (typically mid-July through mid-October), the monthly average discharge flow of wastewater to the lined retention pond shall not exceed 4.5 mgd. The volume shall be determined at DIS-01 as described in Monitoring and Reporting Program R5-2017-XXXX. Note that the number was changed from 1.4 mgd to 4.5 because the blended effluent from the plant is what is discharged into the pond, and that metered quantity appears to be best for the compliance limitation from the facility.

C. Discharge Specifications 7, page 17, As a means of management and to discern compliance with this requirement, J.G. Boswell shall install and maintain in each pond calibration marks that clearly show the water level at design capacity and enable determination of available operational freeboard. [Note: We offered this comment because the permanent staff gauge that was required would obstruct with routine pond maintenance; and when settled solids are excavated from the pond a staff gauge would be destroyed. Currently staff measures the freeboard from the top lip of bank to surface of water with a tape measure. This method has worked out very well for the past 9 years. We can also discuss other options.]

E. Land Application Area Specifications 1, page 18, "The annual nutritive loading of the land application areas, including the nutritive value of organic and chemical fertilizers and of the wastewater shall be consistent with crop demand."

NOTE: We would like to discuss this i, the requirement was that the nutrient loading not exceed the annual crop demand. But as we have discussed with the ILRP, at times due to crop failure or other anomalies, the crop demand may not be consistent with final yield. The additional lands are subject to nutriment monitoring requirements under ILRP and in our opinion this requirement maybe redundant

Monitoring And Reporting Program

DIS-01 and DIS-02, page 2, "During the processing season (typically about 90 days from mid-July through mid-September), a location where the volume/flow of wastewater can be measured prior to discharge to the land application area (DIS-01)." [The remainder is delete] [Please note, we would like to request that this condition be discussed further, there are few points that the board may need to understand, First, the requirement mention later in the Monitoring plan is for meters to measure the water discharged o fields, in the additional lands (DIS 02), the volume/flow of irrigation waters) can be calculated prior to discharge to the land application areas using portable water pump engine use records (DIS-02). The additional land application areas are irrigated using rented portable water pump engines. It is not economically feasible to install water flow meters on every rented portable irrigation engine. In lieu of flow meters, irrigation flows can be calculated using records of engine usage and location. The land application areas are covered under the Irrigated Land Program, which requires engine use records to be kept in order to calculate irrigation flows. Data from these records can be used to determine supplemental irrigation flows to the land application areas.

Effluent/Irrigation Water Monitoring

Page 2, "During the processing season (typically from mid-July through mid-September), the Discharger shall monitor the volume of blended wastewater and irrigation water (from any source) discharged to the land application area at DIS-01." We are requesting that the requirement " All year long, the Discharger shall also monitor the volume of the irrigation water discharged to the land application areas at DIS-02." Be considered for deletion per the discussion previously noted previously that this area is subject to the ILRP.

Page 4, Please note that the supplemental irrigation to the DIS-02 is provided via the use of portable irrigation pumps. A fleet of rental portable pumps are used throughout the ranch, flow meters are not used nor supplied with this equipment; however engineered calculations quantifying the amount of applied water can be provided for the reporting. We are requesting that supplemental irrigation flows are allowed to be calculated using records of engine usage as opposed to flow meters.

Reporting

Page 4, All monitoring results shall be tabulated and submitted in an Annual Monitoring Report, which shall be due by 1 February of the following year. [We propose that the Annual Monitoring Report be submitted after all annual data has been collected, which may include supplemental irrigation and fertilizer applied in November and December of the reporting year.]

Solids Reporting

2.d, page 7, "For animal feed, include: quantity sold. [We would like to discuss this requirement, our animal feed is sold to a 3rd party Broker (Mesa Verde) who distributes the animal feed to various clients. We have no control over the clients the vendor sells to. Our request is that our operation not be required to investigate the final disposition of animal feed.]

Land Application Area reporting

7, page 7 For "A monthly balance for the reporting year..." our request is the reporting be limited to the year, and only to those fields which eluent is applied too. For reasons stated previously above, application area DIS-02 is currently

regulated under the ILRP. We would like to discuss having a revised a. that reads "Monthly average ETo (observed evapotranspiration), Monthly crop uptake"; and a revised b. stating " Monthly average precipitation, Monthly average and seasonal average discharge flow rate".

Attachment B Please note the comments on the flow diagram, in addition, not highlighted is the spelling correction for 'Corcoran'.

Concluding Comments:

Finally, In addition to the attached comments, we would like to discuss a delay for implementation of the Tentative WDR until such time as the effluent is able to be applied to the additional lands, or in the alternative, suggestions from staff on how to address the lands until such time as the conveyance system (pipeline) is installed – it may be two years.

Again, we sincerely appreciate the issuance of the Tentative Waste Discharge Requirements, and we appreciate all of the time and work of staff that went into addressing our project. Understanding staff's busy schedule,, we extend an invitation and would welcome a visit from staff to view the facility and discuss our operation. Thank you.

Sincerely,

Dennis Tristao

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